

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

In Re: \$89,500.00 U.S. Currency

Misc. No.: 2:21-mc-51529

Hon. Stephen J. Murphy, III

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**STIPULATED ORDER EXTENDING UNITED STATES' TIME TO FILE  
FORFEITURE COMPLAINT AND TO TOLL THE CIVIL FILING  
DEADLINE**

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It is hereby stipulated by and between the United States of America, by and through its undersigned attorneys, and Enrique Soria-Llamas, by and through his attorney, Marshall Goldberg, Esq., as follows:

1. On June 28, 2021, the Drug Enforcement Administration (“DEA”) seized the following property: \$89,500.00 U.S. Currency (referred to herein as the “Property”).

2. The Parties acknowledge and stipulate that the DEA provided notice, as required by 18 U.S.C. § 983(a)(1)(A), of the seizure and its intent to administratively forfeit the Property to all known interested parties, including notice to Enrique Soria-Llamas.

3. Enrique Soria-Llamas filed a claim in the administrative forfeiture proceeding with the DEA regarding the Property. No other person has filed a claim to the Property in the administrative forfeiture proceeding.

4. The DEA referred the administrative claim to the United States Attorney's Office for civil judicial forfeiture proceedings.

5. Pursuant to 18 U.S.C. § 983(a)(3)(A) and (B), within 90 days after a claim has been filed in an administrative forfeiture proceeding, the United States is required to:

(a) file a complaint for forfeiture against the claimed property,

(b) return the claimed property, or

(c) include the claimed property for forfeiture in a criminal action,

in order for the United States to take further action to effect the civil forfeiture of the claimed property in connection with the underlying offense, unless the court extends the deadline for good cause shown or by agreement of the parties. In this case, the 90-day deadline would be **December 26, 2021**.

6. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend the 90-day deadline set forth in 18 U.S.C. § 983(a)(3)(A) and (B), and to toll the deadline, in order for the parties to have a reasonable and sufficient period in which to evaluate their respective interests in and positions regarding the Property.

7. Enrique Soria-Llamas knowingly, intelligently, and voluntarily gives up any rights he may have under 18 U.S.C. § 983(a)(3)(A) and (B) to require the United States to file a complaint for forfeiture against the Property, to return the

Property, and/or to include the Property for forfeiture in a criminal action by **December 26, 2021**.

8. The parties agree that the deadline by which the United States shall be required to file a complaint for forfeiture against the Property, to return the Property, and/or to include the Property for forfeiture in a criminal action to toll the civil filing deadline shall be extended **89 days** from **December 26, 2021** to and including **March 25, 2022**.

9. Enrique Soria-Llamas waives all constitutional and statutory challenges related to the foregoing extension and gives up any rights he may have to seek dismissal of any civil forfeiture complaint and/or any criminal forfeiture allegation in a criminal action on the ground that forfeiture proceedings were not timely commenced. Enrique Soria-Llamas further waives and agrees to the tolling of any rule or provision of law limiting the time for commencing, or providing notice of, forfeiture proceedings with respect to the Property, including, but not limited to, the limitations contained in 18 U.S.C. § 983 and 19 U.S.C. § 1621.

10. Enrique Soria-Llamas agrees that until the United States files a complaint for forfeiture against the Property and/or alleges forfeiture of the Property in a criminal action, or until **March 25, 2022**, whichever occurs first, the Property shall remain in the custody of the United States and Enrique Soria-Llamas shall not seek its return for any reason in any manner.

11. By signing below, Marshall Goldberg declares that prior to signing this Stipulation, he provided a copy of it to Enrique Soria-Llamas, reviewed it with Enrique Soria-Llamas, consulted with Enrique Soria-Llamas regarding its contents, answered any questions Enrique Soria-Llamas had about it, determined that Enrique Soria-Llamas understands its terms and is aware of his rights in this matter, and Enrique Soria-Llamas authorized Marshall Goldberg to sign this Stipulation.

12. By their signatures below, the Parties agree to all of the terms and conditions stated herein.

**SO ORDERED.**

Dated: December 17, 2021

s/Stephen J. Murphy, III  
STEPHEN J. MURPHY, III  
United States District Court Judge

Approved as to form and substance:

Saima S. Mohsin  
Acting United States Attorney

s/ Cassandra M. Resposo  
Cassandra M. Resposo (IL 6302830)  
Assistant United States Attorney  
211 W. Fort Street, Suite 2001  
Detroit, MI 48226  
(313) 226-9736  
Cassandra.Resposo@usdoj.gov

Dated: December 15, 2021

s/ Marshall Goldberg (see attached page)  
Marshall Goldberg, Esq.  
Attorney for Enrique Soria-Llamas  
615 Griswold, Suite 1120  
Detroit, MI 48226  
(313) 247-3265  
Megoldberg2003@yahoo.com

Dated: December 17, 2021

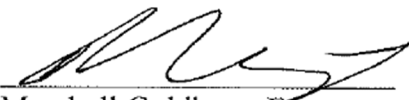
12. By their signatures below, the Parties agree to all of the terms and conditions stated herein.

Approved as to form and substance:

Saima S. Mohsin  
Acting United States Attorney

s/ Cassandra M. Resposo  
Cassandra M. Resposo (IL 6302830)  
Assistant United States Attorney  
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Dated: December 15, 2021

  
Marshall Goldberg, Esq.  
Attorney for Enrique Soria-Llamas  
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